

chargepoint.com



ChargePoint, Inc.
254 East Hacienda Avenue | Campbell, CA 95008 USA
+1.408.841.4500 or US toll-free +1.877.370.3802

September 22, 2021

Mr. Tim Elliot
Washington State Dept of Agriculture (WSDA)
PO Box 42560
Olympia, WA 98504-2650

Re: Rulemaking for 2SSB 5192 on EVSE – Interoperability Standards

Dear Mr. Elliot:

ChargePoint offers the following comments on the Rulemaking for 2SSB 5192 regarding electric vehicle supply equipment (EVSE). We appreciate staff's efforts to hold these stakeholder meetings in advance of drafting the proposed rules. We submit these comments from ChargePoint's perspective as a company that designs, manufactures, and operates a network of electric vehicle (EV) charging stations.

Founded in 2007, ChargePoint is among the world's largest EV charging networks providing scalable solutions for every charging scenario from home and multifamily to the workplace, hospitality, retail, and transport fleets of all types. Our customers include major employers, universities and school districts, municipalities, hotels, and parking garage operators, to owners of small convenience stores to provide EV charging to EV drivers.

The following comments below address Section 6, a new section that is added to chapter 19.94 RCW, concerning (1)-(3), Interoperability Standards that ChargePoint believes WSDA should consider.

One of the goals of WSDA's rulemaking should be to ensure that businesses seeking to install publicly available EV charging stations have a wide range of solutions that align with their business goals and make EV charging easy for site host rather than predetermining which protocols should be required on

EVSE. Many software protocols can hold promise. However, it can be counterproductive to predict which will become industry standards, let alone the versions thereof.

As WSDA considers any requirements, it should proceed with caution. WSDA should be cautious and not move ahead of any international standards processes. Additionally, WSDA should limit its scope of consideration only to standards that are adopted by organizations that are recognized by the American National Standards Organization such as the International Organization for Standardization (ISO), the International Electrotechnical Commission (IEC), or SAE International (formerly the Society of Automotive Engineers). Finally, ChargePoint urges WSDA to be cautious when requiring standards on private businesses. Private businesses choose to provide EV charging for a variety of reasons and are in the best position to determine the equipment and software that will best serve their needs and the needs of EV drivers that utilize their charging services. Overly prescriptive requirements or requiring specific standards could limit the options available to business who would like to install publicly available EV charging stations.

The Open Charge Point Protocol, (OCPP) is a software communication system used to provide communications between a networked charging station and a network management system. However, OCPP is not a standard that is recognized by any independent national or international standards making body. OCPP supports an extremely limited set of network management functionality, such as starting/stopping sessions, basic pricing, and limited access controls. While these features may be sufficient for some businesses, they are not sufficient for all businesses which would like to install publicly available charging stations. WSDA should decline to require any specific software such as OCPP to ensure that EVSE providers can continued to provide drivers and site hosts with innovative software features such as cueing, sharing power between stations, and advanced diagnostics. If specific protocols were mandated, this could hinder innovation and lead to poor EV driver experience.

ChargePoint believes it is valuable to acknowledge the variety of technological solutions available to site host from EV charging providers today, evidenced by the wide range of charging solutions offered to site host on the market today. Imposing mandates to employ specific software or communications protocols would impose a ceiling and limit the flexibility for charging companies to provide important consumer-facing features such as cuing, power sharing, price estimates, and flexible pricing options. Importantly, charging stations do not need to use the same software to enable drivers to use credentials from one network to initiate charging sessions on another. Peer-to-peer roaming agreements between charging companies enable drivers to “roam” between networks and are already being offered globally to facilitate

cost-free roaming for drivers. These roaming agreements are not dependent on any specific software. Therefore, WSDA should not choose a specific software protocol but instead set a goal that ensures customers can access different charging networks when on the road.

Finally, it is important to consider cybersecurity issues in the context of the interactions at the EV charging station, from the station to the cloud, within the mobile application, from mobile to the cloud, within the cloud, as well as the system and organizational certifications and controls. Imposing limits on software could hinder EV charging companies from maintaining robust security regimes. A secure networks centers on the ability to dynamically respond to evolving cyber threats.

We appreciate the ability to provide these comments. If you have any questions or seek further clarification, please contact Cesar Diaz at cesar.diaz@chargepoint.com

Sincerely,

A handwritten signature in black ink, appearing to read 'Cesar Diaz', with a stylized flourish at the end.

Cesar Diaz
Senior Manager, Public Policy
ChargePoint